

April 4, 2017

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte* Submission, WC Docket Nos. 09-197, 11-42

Dear Secretary Dortch:

On March 31, 2017, I spoke with Ryan Palmer, Chief of the Telecommunications Access Policy Division, Wireline Competition Bureau at the Federal Communications Commission ("Commission") by phone.

During my conversation with Mr. Palmer, I gave an overview of SanoConnect through the attached presentation. In addition, I discussed the legal and administrative hurdles for SanoConnect to obtain designation as an Eligible Telecommunications Carrier. The attached presentation provides the details of that discussion.¹

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed via ECFS.

Respectfully submitted,



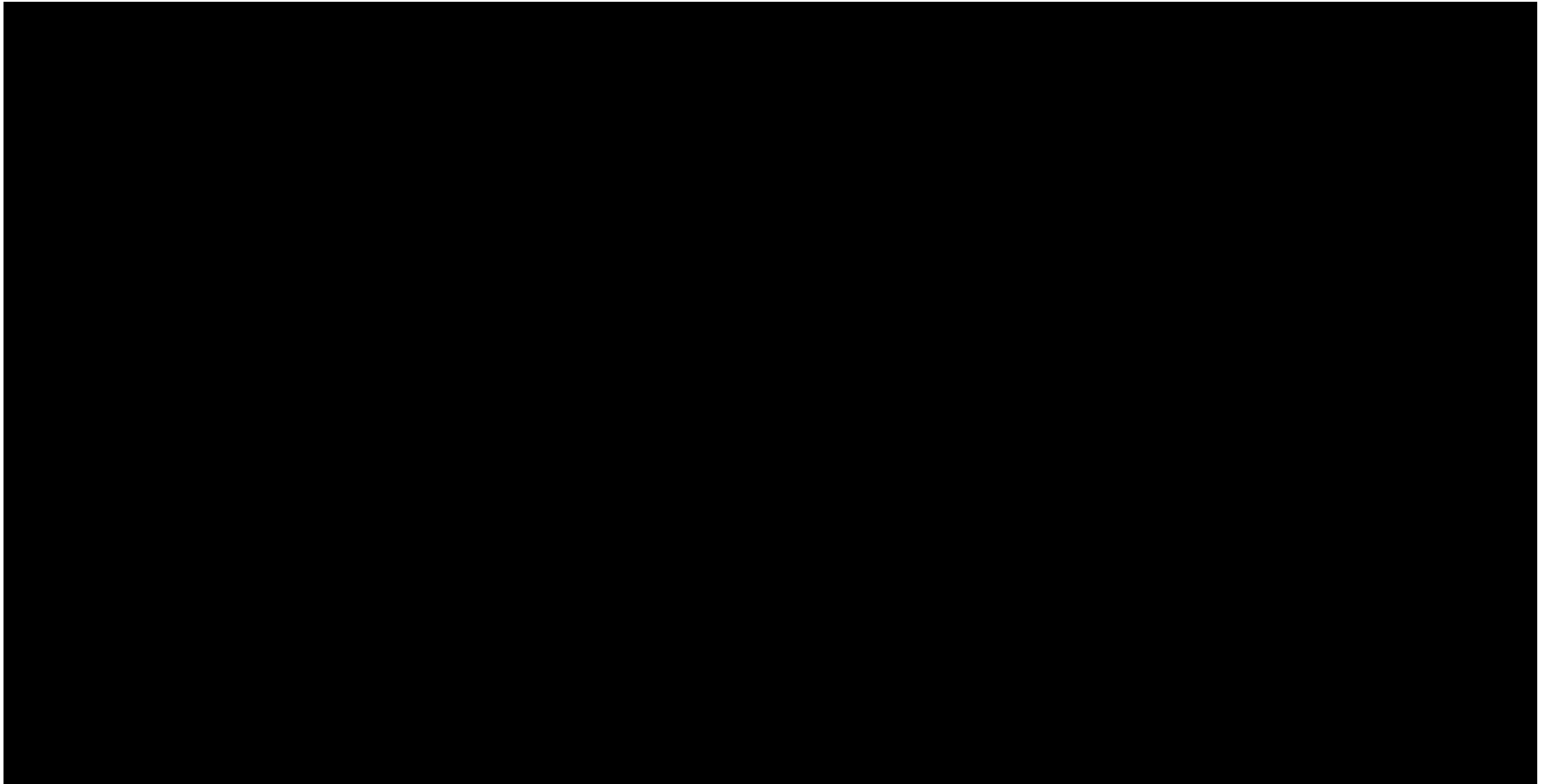
Danielle Frappier
Davis Wright Tremaine LLP
1919 Pennsylvania Avenue, NW, Suite 800
Washington, DC 20006 – 3401

Counsel to: [REDACTED] *SanoConnect*

¹ Confidential treatment has been requested for the presentation. See Letter from Danielle Frappier, Counsel to [REDACTED] SanoConnect, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 09-197, 11-42 (filed on Mar. 22, 2017).

SANOCCONNECT

Introductory Presentation
March 2017



Identifying a “next generation” Lifeline provider that will use a platform to minimize waste, fraud and abuse in the program

The SanoConnect Solution



[redacted]

Sano will apply the Lifeline data subsidy to the recipient's [redacted] service using a [redacted] platform. Most low-income Americans have a smartphone, but have trouble affording data service

[redacted]

Mitigating Waste and Fraud and Reducing Cost in the Lifeline Program



The prevalent way



- ☒ Prone to fraud
- ☒ Prone to mistakes
- ☒ Inefficient



The SanoConnect way



- ☒ State of the art
- ☒ Efficient / real time
- ☒ Fraud free

No Give-Away Phones

recipients are often transient and lack home broadband; but most of them have a smartphone and use it as a primary method of communication

incur high costs with "paper" communication to . New regulations allows them to use electronic communication

- Better communication with
- Improve
- Reduce administrative waste, such as cost of returned mail
- Improve engagement, which will result in and

What Does Sano Need From the FCC?

Forbearance from the facilities requirement

- Direct database access [REDACTED] [REDACTED] should be a basis for granting forbearance—it is the equivalent of the National Verifier two years ahead of schedule

An ETC designation that isn't prohibitively expensive or time-consuming to obtain

- If the process will be state-based, we have some suggestions to help streamline the process

A Uniquely Qualified Founding Team



Evan R. Grayer

- Over 20 years running and advising telecom businesses
- Managed broadband businesses at DIRECTV, Time Warner Cable and AOL
- Telecom lawyer (Harris Wiltshire & Grannis)
- JD, University of Chicago, B.A., Harvard University
- Clerk for Frank H. Easterbrook, 7th Circuit Court of Appeals



Liliane Offredo – Zreik

- Over 25 years experience in telecom industry
- Verizon, Verizon Wireless, Time Warner Cable, Ericsson, Sonus Networks, Cablevision, ACG Research, The Sannine Group.
- MBA, Harvard Business School, M.Eng, Cornell University



Brett C. Moraski

- Over 20 years experience in healthcare/tech/ private equity industries
- Amberson Partners, WellPoint, Highmark, Lycos
- MBA, Harvard Business School, B.A., Notre Dame

Sano will reduce waste,

- By ensuring that subsidy recipients have “skin in the game” – we don’t provide “give-away” phones

Sano will address important challenges in the

program

- By helping

Sano requests that the FCC

- Provide a mechanism for Sano to receive ETC certification
- Provide for an administrative process that will not result in undue delay or expense